RECENT CASES.

Carriers—Termination of Carriage—Character of Liability.—Norton et al. v. *The Richard Winslow*, 67 Fed. Rep. 259 (Wis.). A quantity of grain was shipped from Chicago to Buffalo, at the close of the season, and the freight charges included storage in the vessel for the Winter. This was a custom in the ports of the Great Lakes, and saved the shipper elevator charges, besides securing the shipowner a cargo. The grain was damaged during the period of storage, in the Winter, and the evidence went to show that by the exercise of certain precautions the injury might have been avoided. The owner of the vessel was held liable only as a warehouseman, the court expressing its unwillingness to apply a different rule than the ordinary one of carrier's liability, in spite of the special contract.

Carriers—Negligence of Fellow Passengers.—Gulf, C. & S. F. Ry. Co. v. *Shields*, 29 S. W. Rep. 652 (Texas). A passenger, slightly intoxicated, enters the smoking car of a railroad train and places his baggage, which is in the form of an old tow sack filled with coffee grinders, scrap iron and a jug of alcohol, on the seat beside him, projecting slightly into the aisle. The motion of the train causes the sack to tumble out into the aisle of the car, breaking the jug and spilling the alcohol on the floor. As this flows along the aisle, another passenger, who is just lighting a cigar, throws a match in the way and the alcohol burns up to the ceiling of the car; a third passenger, with silk stockings and celluloid cuffs, has his feet, hand and eyebrows seriously scorched and sues the railroad company for damages. Held, that the contents of the sack being unknown to the conductor and the passenger's conduct not sufficiently boisterous to warrant his ejectment, it was not *actionable* negligence unless it was a proximate cause of the injury.

City Ordinance—Regulation of Pawnbrokers—Constitutional Law.—City of St. Joseph v. *Levin*, 31 S. W. Rep. 101 (Mo.). A city ordinance requiring pawnbrokers to keep a description of all property left with them, and of the persons leaving it, and show this to the police upon demand, is a proper police regulation. It does not conflict with Article II. Section 2, of the Constitution, which provides that the people shall be secure in their homes from unreasonable search at the hands of public officers.